

# **EXHIBIT 1**

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THOMAS ROGER WHITE, JR., and  
CHRISTOPHER MILLS, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

vs.

LG ELECTRONICS, INC., LG  
ELECTRONICS U.S.A., INC.,  
SAMSUNG ELECTRONICS CO.  
LTD., SAMSUNG ELECTRONICS  
AMERICA, INC., SONY  
CORPORATION, and SONY  
ELECTRONICS INC,

And

John and Jane Does (1-Unlimited)

And

ABC Corporations (1-Unlimited),

Defendants.

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) Case No. 17-1775 (MCA) (SCM)

)  
) **PLAINTIFFS' RULE 26 DISCLOSURE**  
) **STATEMENT**

Plaintiffs Thomas Roger White, Jr., and Christopher Mills, by and through  
their attorneys, hereby submit their initial disclosures pursuant to Federal Rules of  
Civil Procedure Rule 26(a)(1) as follows:

**Disclosure No. 1 - Rule 26(a)(1)(A)(i):** *The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.*

**Response to Disclosure No. 1:** The following individuals and entities are likely to have discoverable information supporting Plaintiffs’ allegations and claims contained in the Complaint. Some of the individuals and entities may have knowledge extending beyond the specific subjects for which they are identified. Plaintiffs reserve the right to supplement this response.

Name	Address	Subject(s)
Samsung Electronics America, Inc.	105 Challenger Road Ridgefield Park, N.J. 07660	Allegations and claims contained in the complaint.
Samsung Electronics Co., Ltd.	250, 2-gaepyeong-ro, Jung-gu, Seoul 100-742, Korea.	Allegations and claims contained in the complaint.
LG Electronics USA, Inc.	1000 Sylvan Avenue Englewood Cliffs, New Jersey, U.S.A. 07632	Allegations and claims contained in the complaint.
Defendant LG Electronics, Inc.	LG Twin Tower 128 Yeoui-daero Yeongdeungpo-gu Seoul, South Korea	Allegations and contained in the complaint.
Sony Electronics Inc.	Sony Drive, Park Ridge, NJ 07656.	Allegations and contained in the complaint.
Sony Corporation	1-7-1 Konan Minato-ku, Tokyo 108-0075	Allegations and contained in the complaint.
Cognitive Networks, Inc.	1663 Mission Street # 520 San Francisco, CA 94103	Allegations and claims contained in the complaint, including data-related agreements with



Name	Address	Subject(s)
		Defendants.
Zeev Neumeier	1663 Mission Street # 520 San Francisco, CA 94103	Allegations and claims contained in the complaint, including data-related agreements with Defendants.

**Witnesses and Information Identified by Other Parties:** In addition to the persons listed above, Defendants, their related companies, and/or other entities in privity or concert with Defendants are likely to have additional discoverable information that Plaintiffs may use to support their claims and allegations. Plaintiffs therefore incorporate by reference any individuals identified in Defendant's initial disclosures. Plaintiffs reserve the right to identify additional witnesses and supplement disclosures accordingly

**Rule 26(a)(1)(A)(ii) – Disclosure No. 2:** *A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.*

**Response to Disclosure No. 2:** Pursuant to the Courts' 03/28/18 Order, within 30 days from that Order, Plaintiffs shall identify when, where, and how each television was acquired along with copies of all documents in Plaintiffs' possession relevant to their claims in this action. The Make, Model and Serial Number for each of Plaintiffs' televisions are as follows: Thomas Roger White, Jr.: Samsung, Model No. UN55KU6300F, Serial No. 05HX3CAHB11790N; LG, Model No. 42LE5400, Serial No. 004RMBWDM973; Sony, Model No. KDL-40W650D, Serial No. 5018352; Samsung, Model No. UN32J5500AF, Serial No. 03NL3CGG90593M. Christopher Mills: Samsung, Model LN40A550P3FXZA, Serial No. ALXR3CSQ911405X.

**Rule 26(a)(1)(A)(iii)- Disclosure No. 3:** *A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.*

**Response to Disclosure No. 3:** Plaintiffs intend to retain an expert or experts to opine on the extent of the value Defendants' received stemming from their unlawful collection, transmission, and sale of Plaintiffs' and the Class members' private, confidential information and voices, and to also calculate the precise damages resulting from the wrongs described in Plaintiffs' complaint. Plaintiffs note that discovery will be ongoing in this matter and will supplement this disclosure.

**Rule 26(a)(1)(A)(iv) – Disclosure No. 4:** *For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in action or to indemnify or reimburse for payments made to satisfy the judgment.*

**Response to Disclosure No. 4**

Plaintiffs not aware of any such agreement.

Dated: April 11, 2018

By: /s/ Mack Press

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